

DUBLIN PORT COMPANY

Sustainability Policy

February 2026

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Overview

Introduction

Dublin Port Company (DPC) is committed to driving sustainable growth while ensuring that its operations and strategic decisions align with the highest standards of Environmental, Social, and Governance (ESG) practices. As evidence of this commitment, DPC has developed its ESG Strategy 2025 – 2030 which outlines how it intends to transform the port into a leader in Irish Port sustainable operations.

In addition to DPC's ESG Strategy, DPC has created its Sustainability Policy which outlines key disclosures related to ESG in line with relevant legal and regulatory requirements, such as the Climate Action Framework for the commercial semi-state sector, the European Sustainability Reporting Standards (ESRS) and the Voluntary Reporting Standards for SMEs (VSME) as applicable. DPC recognises the importance of mitigating environmental impacts, fostering sustainability, and aligning its operations with global standards.

DPC also actively monitors emerging legislation and updates in any relevant standards to ensure ongoing compliance and to continuously enhance its sustainability and ESG practice.

Scope

This policy applies to all operations of Dublin Port Company (DPC), including all employees and contractors. Please note that references to "employees" throughout this policy also include contractors engaged by or working with DPC.

1. Environment

1.1 Introduction

DPC is committed to promoting environmental sustainability in all of its activities and processes. DPC has identified Environmental Management, Climate Change, Biodiversity and Ecosystems, Pollution Prevention, and Resource Use and Circular Economy, as areas of particular importance. DPC will consider environmental issues in all of its business processes.

1.2 Environmental Management

DPC is committed to tackling relevant environmental issues and challenges through implementations of its Environmental Management System (EMS) supported by its Environmental Policy. Implementation of the EMS enables DPC to identify and manage its environmental aspects, compliance requirements and the concerns of interested parties. Determining relevant issues and requirements through the structured systems of the EMS enables DPC to minimise negative impacts associated with its operations and identify and enhance beneficial activities through implementing a continuous improvement and review process.

DPC's Environmental Management System is structured and implemented to meet the requirements of the European Sea Ports Organisation, PERS (Port Environmental Review System), and ISO 14001 Standard.

1.3 Climate Change

DPC recognises the impact of climate change at global and local level. DPC is in partnership with the Sustainable Energy Authority of Ireland (SEAI) through the Public Sector Energy Partnership Programme and is committed to meeting the goals of the Irish Public Sector Climate Action Plan to reduce Scope 1 and 2 Green House Gas (GHG) emissions by 51%, to deliver an energy efficiency improvement of 50% by 2030, and to achieving Net Zero carbon emissions by 2050. DPC reports annually on energy performance and greenhouse gas emission reductions to the SEAI and develops initiatives to meet national energy and decarbonisation targets aligned with Ireland's Climate Action Plan. DPC will identify relevant Scope 3 emission categories for the Port and develop emission reduction plans. DPC is committed to measuring its Scope 1 and 2 GHG emissions and utilising the GHG Protocol for measuring and reporting Scope 1, 2, and 3 emissions.

DPC manages its energy use and consumption through its Energy Management System (EnMS) which is implemented to meet the requirements of the ISO 50001 standard. DPC is committed to managing its energy use in line with its Energy Policy commitments.

DPC is committed to integrating risk management, climate resilience and adaption into its operational and strategic planning, including measures to protect critical infrastructure from extreme weather events and ensuring continued operation in the face of climate disruptions.

1.4 Biodiversity and Ecosystems

DPC recognises the importance of Biodiversity and Ecosystems and has a clear focus on its responsibility and role in championing and maintaining the local environment which sits within a designated UNESCO Biosphere and the wider Dublin Bay area and the neighbouring North Bull Island SPA, North Dublin Bay SAC, South Dublin Bay & River Tolka Estuary SPA, South Dublin SAC. DPC actively works with partners to promote conservation, facilitate studies, and promote ecosystem health. DPC will consider biodiversity and ecosystems when developing and managing its infrastructure.

1.5 Pollution Prevention

DPC implements processes for pollution prevention across all its operations. Where relevant DPC actively monitor pollutant sources and assists with third party monitoring campaigns. DPC maintains pollution response processes which are routinely trailed and coordinates its activities with relevant state agencies. DPC implements air, water and noise monitoring programmes.

1.6 Resource Use and Circular Economy

DPC is committed to implementing the processes of defining and managing materials in line with the concept of a waste hierarchy system. Through the implementation of its environmental system, DPC will focus on preventing, reusing and minimising waste to the greatest degree possible. DPC will ensure materials used associated with its processes and projects are used efficiently and will be sourced to ensure minimal waste, if any, is generated.

2. Social

2.1 Introduction

DPC is committed to sustainability in social and workforce-related issues, particularly in relation to our Own Workforce, Affected Communities, Consumers and End-users, and Workers in the Value Chain. DPC focuses on areas such as employee rights, health and safety, diversity, inclusion, and overall well-being. It aligns with international best practices and local laws, ensuring compliance with the latest regulatory guidelines.

2.2 Workforce Health and Safety

DPC is committed to workforce health and safety and its Health and Safety Policy is founded on the belief that all accidents are preventable. DPC commits to doing all that is reasonably practicable to prevent injury or ill health to employees, contractors, customers, the public, and anyone affected by its activities. These commitments are implemented through the implementation, communication and coordination of the

company Safety Statement which is supported by the CEO and the Senior executive team. The safety statement and its contents are reviewed at regular intervals and as and when required to ensure continual improvement.

2.3 Diversity and Inclusion

DPC's Diversity and Inclusion Policy is dedicated to fostering a diverse and inclusive environment by ensuring equal treatment and opportunities for all employees, customers, suppliers, and stakeholders.

DPC is committed to embedding diversity and inclusion into our day-to-day practices. Our goal is to create a workplace where everyone feels they belong and can contribute to the success of the organisation. We will deliver this through:

1. Leadership Commitment
2. Training and Awareness
3. Equal opportunities
4. Supportive working environment
5. Zero tolerance
6. Fair recruitment, promotion and retention practices
7. Role Model to partner organisations and stakeholders.

2.4 Equal Pay and Compensation

DPC is committed to ensuring that equal pay is provided for equal work across its operations. Compensation is based on job roles, qualifications, experience, and performance, ensuring fairness and equity. DPC is actively working to address our gender pay gap by assessing pay disparities and working toward reducing the gender pay gap using data and insights. Dublin Port Company is committed to annually publishing its [Gender Pay Gap Report](#), the first one having been published in 2024.

2.5 Anti-Harassment

DPC upholds a strict anti-harassment policy, ensuring no individual is harassed, sexually harassed or bullied in any manner at work. The company promotes a culture of respect, dignity, and equal opportunity. This commitment is outlined in DPC's Diversity and Inclusion Policy.

Clear processes are in place for employees to report harassment, with a structured approach for investigating and resolving any claims.

Dublin Port Company is committed to creating a working environment free of harassment, sexual harassment and bullying, and ensuring all staff are treated, and treat others, with dignity and respect.

All colleagues are encouraged to challenge inappropriate behaviour, and supports are detailed in our Dignity at Work Policy which sets out expectations and processes to address any concerns.

2.6 Respect for Human Rights and Labour Rights

Dublin Port Company is committed to creating a working environment free of harassment, sexual harassment and bullying, and ensuring all staff are treated, and treat others, with dignity and respect. This includes ensuring compliance with all national and international labour laws, addressing forced labour, child labour, and human trafficking, and promoting fair wages, benefits, and working conditions for all employees.

DPC has zero tolerance for human trafficking, forced labour, or child labour in its operations and supply chain, and ensures that all workers are of legal working age and employed voluntarily.

2.7 Affected Communities

DPC's commitments to Affected Communities is outlined in its [Community Engagement programme](#). This programme comprises three key elements that DPC focuses on to improve local community relations, which are: Education, Community and Sport.

DPC will continue to support and prioritise its commitments to Affected Communities through regular engagement with the local community. The Port also provides a range of public amenities through its distributed museum network, most recently the Dublin Port Greenway, and supports affected communities with a range of events and initiatives to foster port-city integration.

2.8 Workers in the Value Chain

DPC recognises its responsibility to promote and where possible ensure fair and ethical treatment of all workers throughout its value chain. DPC's commitment to Workers in the Value Chain includes implementing a Supplier Code of Conduct, and supplier training and development.

2.9 Consumers and End-Users

DPC is committed to maintaining high standards of service and transparency for all Consumers and Port End-Users. This commitment includes transparent communication, stakeholder feedback, accessible Port services and investment in digital Innovation.

3. Governance

3.1 Introduction

Dublin Port Company has a governance structure and defined roles and responsibilities for overseeing and managing sustainability efforts. DPC is committed to maintaining high

standards of corporate governance and has adopted the principles of corporate governance and the Code of Practice for the Governance of State Bodies, issued by the Department of Public Expenditure and Reform: [gov – Governance \(www.gov.ie\)](http://www.gov.ie). The Company also complies with its obligations under the Ethics in Public Office Act, 1995 and the Standards in Public Office Act, 2001.

3.2 Governance Structure, Roles, and Responsibilities

DPC has established a governance structure, designed to support effective management of sustainability and ethical practices. Key roles include the Board of Directors, an Audit and Risk Committee, an ESG Steering Committee, an ESG Team and a Procurement function.

Each department is responsible for integrating sustainability into their operations, and DPC's overall sustainability performance will be reviewed annually. Regular audits, assessments, and performance reviews ensure that governance standards are adhered to across the organisation.

Sustainability Training is provided to the Board of Directors, Executive Management Team and all DPC employees.

3.3 Ethical Conduct

Integrity in Business Operations

DPC is committed to conducting business ethically and with integrity, ensuring compliance with all relevant laws and regulations. DPC has a range of policies in place to ensure this, including an Employee Code of Conduct, a Directors 'Code of Conduct, and clear accountability mechanisms for ethical behaviour.

Corruption and Bribery

DPC has a zero-tolerance policy toward corruption and bribery. This includes a prohibition on bribery, and supplier due diligence through the Supplier Code of Conduct.

Business Conduct and Corporate Culture

DPC fosters a culture of integrity, accountability, and respect, promoting ethical business practices across all levels of the organisation. To achieve this Senior leader are required to sign a Code of Ethics annually to demonstrate adherence to ethical standards.

3.4 Protected Disclosure/ Whistleblower Protection

DPC encourages ethical behaviour and transparency by providing a safe, confidential, and accessible mechanism for employees to report misconduct or ethical concerns without fear of retaliation as outlined in DPC's [Protected Disclosures Policy](#). Dedicated channels are available to employees to report issues related to corruption, fraud, or

unethical behaviour orally or in writing. All reported issues are promptly investigated, and corrective actions are taken when necessary.

3.5 Transparency and Conflicts of Interest

DPC is committed to transparency in all business dealings, ensuring that operations, decisions, and financial activities are clear and open to scrutiny. Employees and executives must disclose any potential conflicts of interest. Regular conflict-of-interest declarations is required to maintain the company's ethical standards.

3.6 Employee Data Protection and Privacy

DPC adheres to the highest standards of data protection, ensuring the privacy of employee data and compliance with applicable privacy regulations. DPC operates clear guidelines on the collection, analysis, and storage of workforce metrics, ensuring that personal data is used solely for business purposes in line with all General Data Protection Regulations.

3.7 Data Protection and Privacy for Consumer Information

DPC is committed to safeguarding the privacy of consumer information in accordance with applicable privacy regulations. DPC has clearly defined privacy policies regarding the collection, storage, and use of consumer data. DPC ensures that consumers are informed and aware of the use of their personal data.

3.8 Review and Maintenance

DPC will review this policy annually and update it as required.

Policies, Codes and Certifications

#	Code/Policy/Certification	Link to the website if available
1	Eco Ports Pers	RQA1199233- -DublinPortCompany_-Certificate-January-2025.pdf
2	Energy Policy	DPC_EGY_001_Energy-Policy-2025.pdf
4	Environmental Policy	Environmental Policy
5	SEAI Public Partnership Certificate	Dublin-Port-Company-SEAI-Public-Sector-Partnership-Certificate.pdf
5	ISO 5001	DPC_EGY_001_Energy-Policy-2025.pdf
6	Health and Safety Policy	Health-Safety-Policy-MAY_2023.pdf
7	Diversity and inclusion Policy	Diversity-and-Inclusion-Policy-V.1-May-2025.pdf
8	Code of Conduct for employees	Employees-Code-of-Conduct.pdf
9	Director's code of Conduct	2025-BOARD-GOV-Directors-Code-of-Conduct-30-May-2025.pdf
10	Supplier code of Conduct	DPC-Supplier-Code-of-Conduct-Web-Version.pdf
11	Sustainable Procurement Policy	Not publicly available
	DPC- Terms Conditions for Good and Services	https://www.dublinport.ie/wp-content/uploads/2019/10/2019.10.01-DPC-TERMS-CONDITIONS-FOR-GOODS-and-SERVICES-2019-1.pdf
12	Protected disclosure Policy	Protected Disclosures - Dublin Port
13	Privacy Policy	https://www.dublinport.ie/privacy-policy/
14	Dignity at Work	Not publicly available

Signature:

Barry O'Connell, Chief Executive Officer

Date: 16th February 2026

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